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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DYLAN STATON,
Plaintiff,
vs.
KILIGO KIJAKAZI,
Acting Commissioner of Social Security,
Defendant.

) Case No.: 2:22-cv-01139-DJA
)
) **UNOPPOSED MOTION FOR EXTENSION OF**
) **TIME TO FILE RESPONSE TO MOTION TO**
) **REMAND**
) **(FIRST REQUEST)**
)
)

Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (the “Commissioner”), by and through her undersigned attorneys, hereby moves for a 30-day extension of time to file her response to Plaintiff’s motion to remand. The response is due to be filed by January 30, 2023. This is the Commissioner’s first request for an extension of time to file the response.

Defendant submits that good cause exists for this extension request because the attorney tasked with writing the response has several concurrent deadlines, and needs sufficient time to review the record, evaluate the issues raised in Plaintiff's motion to remand, and prepare Defendant's response. Defendant's counsel will endeavor to complete these tasks as soon as possible. This request is made in good faith and with no intention to unduly delay the proceedings, and counsel apologizes for any inconvenience. Accordingly, Defendant requests an extension in which to respond to file the response until March 1, 2023.

The undersigned conferred with Plaintiff's counsel, who confirmed on January 20, 2023, that Plaintiff has no objection to the requested extension.

It is therefore respectfully requested that Defendant be granted an extension of time to file the response to Plaintiff's motion to remand, through and including March 1, 2023.

Dated: January 27, 2023

JASON M. FRIERSON
United States Attorney

/s/ Michonne L. Omo
MICHONNE L. OMO
Special Assistant United States Attorney

IT IS SO ORDERED;

UNITED STATES MAGISTRATE JUDGE

DATED: January 27, 2023

1 **CERTIFICATE OF SERVICE**

2 I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My
3 business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the
4 above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR**
5 **EXTENSION OF TIME TO FILE RESPONSE TO MOTION TO REMAND** on the following
6 parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System,
7 which provides electronic notice of the filing:

8 **Hal Taylor**
9 haltaylorlawyer@gbis.com
10 Attorney for Plaintiff

11 I declare under penalty of perjury that the foregoing is true and correct.

12 Dated: January 27, 2023

13 /s/ *Michonne L. Omo*
14 MICHONNE L. OMO
15 Special Assistant United States Attorney